

**III. REMARKS**

Claims 1-28 are pending in this application. By this amendment, claims 1-5, 7-9, 12, 14-21 and 23-27 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-3, 6-7, 10-13, 15-19, 22-25 and 28 are rejected under 35 U.S.C. §102(b) as allegedly being anticipated by "A Simple Network Management Protocol," hereafter "SNMP." Claims 4-5, 8-9, 14, 20-21 and 26-27 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over SNMP.

Initially, Applicants thank the Examiner for the telephone interview of November 4, 2004 with their representatives. In the interview, the Examiner agreed with Applicants' representatives that the proposed amendments would serve to bring the claims into better condition for allowance.

**A. REJECTION OF CLAIMS 1-3, 6-7, 10-13, 15-19, 22-25 and 28 UNDER 35 U.S.C.****§102(b)**

With regard to the 35 U.S.C. §102(b) rejection over SNMP, Applicants assert that SNMP does not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 7, 17 and 23, Applicants submit that SNMP fails to teach or suggest collecting device identification and detail information from devices on the network. The SNMP

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publication describes an architectural model having a collection of network management stations that monitor and control network elements, such as hosts, gateways, terminal servers, etc. Page 5, Section 3. The monitoring and controlling that is done by the SNMP network management stations is performed by management agents within the network elements. Page 5, Section 3. The network management stations in SNMP use the Simple Network Management Protocol to communicate to the agents the information that is needed to monitor and control the network elements. Page 5, Section 3. Furthermore, the information in SNMP is specifically referred to as management information, not device identification and detail information. Page 5, Section 3. Nowhere does SNMP teach that the architectural model collects device identification and detail information. In contrast, the present invention includes "...collecting device identification and detail information from devices on the network." Claim 1. As such, the device identification and detail information as included in the claimed invention is not simply communicated as in the SNMP architecture, but rather is collected from devices on the network. Furthermore, the information collected from devices on the network as included in the present invention is, *inter alia*, device identification and detail information, not management information to monitor and control network elements as is the information that is communicated in SNMP. Thus, the collection of device identification and detail information from devices on the network as included in the present invention is not equivalent to the communication of management information in SNMP. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 1, 7, 17 and 23, Applicants respectfully submit that SNMP also fails to teach collecting the device identification and detail information at user

predetermined scheduled times. As stated above, the SNMP architecture communicates management information to monitor and control network elements. One way that the SNMP architecture monitors network elements is through polling these network elements. Page 7, Section 3.2.3, paragraph 2. Polling is normally defined as a technique that continually interrogates a peripheral device. As such, polling is not considered to be analogous to user predetermined scheduled times because polling is continual and is not user determined. In addition, the SNMP architecture expressly states that the timing of its polling is guided by a limited number of unsolicited messages, not user input. Page 7, section 3.2.3, paragraph 2. SNMP does not in any way teach that its polling occurs at user predetermined scheduled times. The present invention, in contrast, includes "...collecting the device identification and detail information at user predetermined scheduled times." Claim 1. As such, in the current invention, the device identification and detail information is collected at user predetermined scheduled times, not continually polled as in SNMP. Furthermore, the scheduled times as included in the claimed invention are not guided by a limited number of unsolicited messages as is the polling in SNMP, but rather are user predetermined. For the above reasons, the polling of SNMP is not equivalent to the collecting of device identification and detail information at user predetermined scheduled times as included in the claimed invention. Accordingly, Applicants request that the rejection be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features.

Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

**B. REJECTION OF CLAIMS 4-5, 8-9, 14, 20-21 and 26-27 UNDER 35 U.S.C. §103(a)**

With regard to the 35 U.S.C. §103(a) rejection over SNMP, Applicants respectfully disagree with the Office's arguments about functionality. The Office admits that SNMP does not expressly disclose wherein the device identification and detail information includes device identity / types, addresses, device characteristics, software installed on the devices, and software characteristics of the devices on the network as included in claims 4, 8, 14, 20 and 26. Additionally, the Office admits that SNMP does not expressly disclose wherein the generated mapping report includes the device identity / types, the device addresses, the device characteristics, the software installed on the devices, and the software characteristics as included in claims 5, 9, 21 and 27. However, the Office alleges that these elements are nonfunctional descriptive material and are not functionally involved in the steps recited. Applicants respectfully submit that the features of dependent claims 4, 8, 14, 20 and 26 serve to further define the term "device identification and detail information" as included in the independent claims from which the claims depend. Furthermore, the features of dependent claims 5, 9, 21 and 27 serve to further define the term "generated mapping report" as included in the independent claims from which the claims depend. As such, the features in the dependent claims enumerate some of the elements that are collected, analyzed, reported on or otherwise manipulated by the invention and are therefore functional. For the above stated reasons, the

features in the dependent claims are not simply nonfunctional descriptive material as asserted by the Office. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

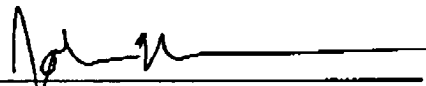
With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

#### IV. CONCLUSION

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

Date: November 4, 2004

  
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